

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NEW FALLS CORPORATION,

Plaintiff,

-against-

SONI HOLDINGS, LLC, KUNAL SONI, ANJALI
SONI, 632 MLK BLVD JR LLC, OM P. SONI, SONI
CAPITAL RESOURCES, LLC, KANWAL KAPUR,
WEANONA HUGIE and RICHARD SPEARS,

Defendants.
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Case No. 19-cv-00449
(HG)(LGD)

Hon. Hector Gonzalez

NOTICE OF MOTION

Oral Argument Requested

PLEASE TAKE NOTICE, that upon the annexed affirmation of Steven Giordano, Esq., dated March 31, 2023, the exhibits annexed hereto, and upon all the pleadings and proceedings had herein, Plaintiff will move before the Honorable Hector Gonzalez, at the courthouse located at 100 Federal Plaza, Central Islip, New York, for an Order:

- a. Pursuant to Fed. R. Civ. Pro. Rule 72(a), reviewing and reversing the portion of the Order by Magistrate Judge Lee G. Dunst, dated March 17, 2023 [DE 207], which erroneously denied Plaintiff's motion for discovery dating back to 2006, (originally filed at [DE 128], then [DE 146-2] and [DE 193-1]), even though the documents from the requested time period are relevant, material and necessary pursuant to the Federal Rules, the case law, the facts, and the transactions and occurrences set forth in the Amended Complaint, and the denial of the right to the said discovery unduly prejudices Plaintiff in this action; and
- b. For such other and further relief as the Court deems just and proper under the circumstances.

Dated: New York, New York
March 31, 2023

VLOCK & ASSOCIATES, P.C.
Attorneys for Plaintiff
630 Third Avenue, 18th Floor
New York, New York 10017
(212) 557-0020
By: s/Steven Giordano
Steven Giordano, Esq.
Sgiordano@vlocklaw.com